

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

)	Case No. 07-40492-399
James R. & Joann Brown,)	
)	
)	Chapter 13
Debtors.)	
)	
MISSOURI DEPT. OF REVENUE,)	
)	
Movant,)	
)	Debtors' Answer to Motion
vs.)	to Dismiss
)	
James R. & Joann Brown,)	
)	
Respondents.)	
)	

DEBTORS' ANSWER TO MOTION TO DISMISS

Come now Debtors, James R. and Joann Brown, by and through their attorney, and answer the Missouri Department of Revenue's Motion to Dismiss, as follows:

1. Debtors admit each and every allegation contained in paragraphs 1 and 6.

2. Debtors have insufficient information to admit or deny each and every allegation contained in paragraphs 2, 3, 4 and 5.

3. Debtors are in the process of obtaining their income tax return and/or affidavit for the year of 2006. Debtors requests that this matter be set for hearing.

WHEREFORE, the Debtor pray the Court refuse the Missouri Department of Revenue's Motion to Dismiss and for such other relief as the Court deems just and proper.

RESPECTFULLY SUBMITTED,

CASTLE LAW OFFICE,

/s/James R. Brown, EDMO #46155; MO #42100
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PROOF OF SERVICE

The undersigned hereby certifies that a true and accurate copy of the foregoing Debtors' Answer to Motion to Dismiss filed by Missouri Department of Revenue, was mailed to all parties who HAVE NOT BEEN ELECTRONICALLY NOTIFIED, including the Debtors this 3rd day of May, 2007.

/s/ Robert Zerkel

Missouri Department of Revenue
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